

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

AMPEX CORPORATION,

Plaintiff,

V.

C.A. No. 04-1373 (KAJ)

EASTMAN KODAK COMPANY,
ALTEK CORPORATION, and
CHINON INDUSTRIES, INC.,

Defendants.

NOTICE OF DEPOSITION OF HIROSHI YAMAGATA

Please take notice that Plaintiff Ampex Corporation (“Ampex”) will take the deposition upon oral examination of Hiroshi Yamagata, pursuant to Rule 30 of the Federal Rules of Civil Procedure. The deposition will be held at the American Consulate General Osaka-Kobe, Osaka-Kobe 2-11-5 Nishitenma, Kita-ku, Osaka 530-8543 Japan commencing on or about January 18, 2006, at 9:00 a.m. or at such other date, time and place as mutually agreed upon by counsel, and continuing from day to day until completed.

This examination will be taken before a Notary Public or other person authorized to administer oaths and will be recorded stenographically and/or by video and shall continue from day to day until completed. Testimony derived pursuant to this Notice of Deposition shall be used for any and all appropriate purposes permitted by the Federal Rules of Civil Procedure.

You are invited to attend.

MORRIS, NICHOLS, ARSHT & TUNNELL

/s/ Jack B. Blumenfeld (#1014)

Jack B. Blumenfeld (#1014)

Julia Heaney (#3052)

1201 North Market Street

P.O. Box 1347

Wilmington, DE 19899-1347

(302) 658-9200

jblumenfeld@mnat.com

Counsel for Plaintiff Ampex Corporation

OF COUNSEL:

Jesse J. Jenner

Sasha G. Rao

Ropes & Gray LLP

1251 Avenue of the Americas

New York, New York 10020

(212) 596-9000

Norman H. Beamer

Gabrielle E. Higgins

Ropes & Gray LLP

525 University Avenue

Palo Alto, California 94301

(650) 617-4000

James E. Hopenfeld

Ropes & Gray LLP

One Metro Center

700 12th Street, NW

Washington, DC 20005

November 23, 2005

CERTIFICATE OF SERVICE

I, Jack B. Blumenfeld, hereby certify that on November 23, 2005, I caused to be electronically filed Notice of Deposition of Hiroshi Yamagata with the Clerk of the Court using CM/ECF, which will send notification of such filing(s) to the following:

Paul M. Lukoff
David E. Brand
Prickett, Jones, Elliott, P.A.

and that I caused copies to be served upon the following in the manner indicated:

BY HAND

Paul M. Lukoff
Prickett, Jones, Elliott, P.A.
1310 King Street
Wilmington, DE 19899

BY FEDERAL EXPRESS

Michael J. Summersgill
Wilmer Cutler Pickering Hale and Dorr LLP
60 State Street
Boston, MA 02109

S. Calvin Walden
Wilmer Cutler Pickering Hale and Dorr LLP
399 Park Avenue
New York, NY 10022

/s/ Jack B. Blumenfeld (#1014)

Jack B. Blumenfeld